

# EXHIBIT 5

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

Trudy B. Grant, Sarah Krawcheck, )  
Nashonda Hunter, Max Milliken, )  
Jordan Mapp, and Caleb Clark, )

Plaintiffs, )

v. )

Howard Knapp as the Executive )  
Director of the South Carolina )  
Election Commission, Dennis Shedd )  
(Chair), JoAnne Day, Clifford J. )  
Edler, Linda McCall and Scott )  
Moseley, as Members of the South )  
Carolina Election Commission, and )  
Charleston County Board of )  
Elections and Voter Registration, )

Defendants. )

Case No.: 2:23-cv-06838-BHH

**Plaintiff Clark's Answers to State Defendants' First Interrogatories**

Plaintiff Caleb Clark provides the following answers to Election Defendants' First Set of Interrogatories.

Definitions and Instructions are as specified in the Interrogatories, with the following supplementation:

Plaintiff Clark was only 4 years old in 2008, so answers to Interrogatories 1, 2 and 5 are provided for all dates since Plaintiff Clark became 18 years old and thus eligible to vote

**ANSWERS**

1. For each of the Plaintiffs, state your full name, any/and all prior names, including aliases or nicknames, dates of birth, Social Security numbers, your current address, and all addresses for

the years 2008 through the present. For each address, document the inclusive months and years you lived at each address and whether you owned or rented each address.

**Answer:** Caleb Quinton Simmon-Clark; Plaintiff Clark has also been known as Caleb Clark; DOB : [REDACTED]/2004; SSN: [REDACTED]; Current address: [REDACTED] Hanahan, SC 29410 (family home.)

2. For each of the Plaintiffs, describe the date and the precinct, county, and state in which you are or have been registered to vote for the years 2008 through the present. Document the inclusive months and years you were registered to vote in each precinct, county, and state.

**Answer:** Plaintiff Clark is registered in Foster Creek Precinct 2, Berkeley County, SC.

3. For each of the Plaintiffs, describe every election in which you voted by year and type of election, (*e.g.* primary, general, special).

**Answer:** 2022 (Hanahan Municipal and state general election).

4. For each of the Plaintiffs, for every election described in response to Interrogatory number 3, indicate:

- a. the method of voting you used; and
- b. whether you requested an absentee ballot application, and if so, the county board of voter registration and elections to which the request was made, the absentee application excuse identified on the request, whether the application was granted or denied, and if denied, the reason for the denial.

**Answer:** a. In-person, either on Election Day at the polling place or Early at County headquarters.

b. No.

5. For each of the Plaintiffs, describe all election(s) in which you were unable to cast a ballot because you could not vote absentee by mail and the reason you were unable to cast a ballot on election day in this election.

**Answer:** None.

6. For each of the Plaintiffs, describe your employment status for the years 2008 through the present. For each employer or school listed, document the inclusive months and years you were employed or in school, the address of the employer or school, and the date of graduation if applicable.

**Answer:** Plaintiff Clark graduated from Goose Creek High School in 2023.

7. For each of the Plaintiffs, state whether you contend that you currently qualify or have ever qualified to vote absentee under S.C. Code Ann. §§ 7-15-110, 7-15-320, 7-15-600, *et. seq.*, or any other current or former provision of Title 7 of the S.C. Code Ann., and describe the qualification.

**Answer:** No.

Under penalty of perjury, I declare that the foregoing answers are true and correct.

*Caleb Quinton Simmon-Clark*

7/10/2024

---

Caleb Quinton Simmon-Clark

Date

Date: July \_\_\_, 2024

s/Armand Derfner

---

Derfner & Altman, LLC

Armand Derfner, Fed. ID No. 528

Jonathan S. Altman, Fed. ID No. 5796

575 King Street, Suite B

Charleston, SC 29403

[aderfner@derfneraltman.com](mailto:aderfner@derfneraltman.com)

[jaltman@derfneraltman.com](mailto:jaltman@derfneraltman.com)

Telephone: (843) 723-9804

Susan K. Dunn, Fed. ID No. 647

37 Charlotte Street, Suite A

Charleston, SC 29403

[susandunn1950@gmail.com](mailto:susandunn1950@gmail.com)

Telephone: (843) 830-1571

Chad W. Dunn, Esq. (*Pro Hac Vice*)

Brazil & Dunn, LLP

1900 Pearl Street

Austin, TX 78705

[chad@brazilanddunn.com](mailto:chad@brazilanddunn.com)

Telephone: (512) 717-9822

*Attorneys for Plaintiffs*